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January 2, 2013

**via ELECTRONIC FILING**

Magistrate Judge A. Kathleen Tomlinson  
United States District Court Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, N.Y. 11722

Re: Thomas M. Moroughan v. County of Suffolk, et al.  
12-CV-0512 (JFB)(AKT)

Dear Judge Tomlinson:

Pursuant to Your Honor's Minute Order dated December 13, 2012, Document #51, I am providing under separate cover and not electronically:

- Anthony DiLeonardo's home, work, and cellular telephone numbers for the period covering February 26, 2011 through November 30, 2012;
- Sophia Corina's cellular telephone number for the period covering February 26, 2011 through November 30, 2012;
- Edward Bienz's cellular telephone number for the period covering February 26, 2011 through November 30, 2012;
- Defendant DiLeonardo's cellular telephone records covering February 26, 2011 through August 2012;
- Defendant DiLeonardo's home telephone records covering October 22, 2012 through November 30, 2012;
- E-mail correspondence between Anthony DiLeonardo and Sophia Corina for the dates of December 13, 2011 through November 30, 2012; and
- Cash withdrawal transaction documentation from February 26, 2011.

Presently, we are in the process of obtaining Mr. DiLeonardo's cellular phone records from August 2012 through November 2012 and his home telephone records covering February 26, 2011 through November 30, 2012. Defendant DiLeonardo is also in the process of obtaining the text messages which are retrievable from February 26, 2011 to November 30, 2012 and he is in the process of obtaining e-mail correspondence between himself and Sophia Corina from February 2011 through December 2011.

I am requesting a 30 day extension of the deadline to produce the outstanding records detailed above. Mr. DiLeonardo put in requests for this information to his service providers the day after Your Honor issued the minute order and we are awaiting a response from each provider. If the material is produced to my client before the 30 day extension date we will immediately produce the outstanding records to the Court and to plaintiff's counsel.

However, at this time I am compelled to request this extension of time to provide the remaining outstanding records.

Respectfully Submitted,

BARKET MARION EPSTEIN & KEARON, LLP

By:

  
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Amy B. Marion

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